

6/18/96 DRAFT

DEPARTMENT OF ECOLOGY

IN THE MATTER OF:) AGREED ORDER
)
 U.S. Department of Energy) DE 96NM-087
 Richland, Washington)
 Respondent)

I. Statutory Authority

This Agreed Order (Order) is issued to the U.S. Department of Energy (Respondent) under the Washington Clean Air Act, pursuant to RCW 70.94.141(3), RCW 70.94.331(1), and RCW 70.94.332.

II. Statement of Purpose

The purpose of this Order is to establish commitments regarding: 1) resolution of compliance issues related to the Respondent's 300 Area #1 Package Boiler; and 2) the reduction of air pollution at the Respondent's Hanford Site.

III. Statement of Facts

1. The Respondent owns and operates several boilers across the Hanford Site. One such boiler is the 300 Area #1 Package Boiler (Nationwide Boiler Model NOS252SP, Serial Number 02519), operated for steam generation. Construction of that boiler commenced in September 1989. The boiler historically burned #6 fuel oil and operated intermittently until January 1996.

2. The Washington State Department of Ecology (Ecology) issued a Notice of Violation (DE 96NM-033) to the Respondent on March 6, 1996 for failing to meet the State prevention of significant deterioration (PSD) regulations (WAC 173-400-141) and new source performance standards (NSPS) regulations (WAC 173-400-115) at the 300 Area #1 Package Boiler. The Notice of Violation (NOV) describes Ecology's regulatory and enforcement authority, the events that lead to the NOV, and the regulations pertinent to the NOV. The NOV is included in this Order as Attachment 1.

3. Pursuant to RCW 70.94.435, the Respondent submitted an Assurance of Discontinuance for the 300 Area #1 Package Boiler via an April 9, 1996 letter to Ecology. In addition to the Assurance of Discontinuance, that letter discussed the Respondent's position that emissions from the 300 Area #1 Package Boiler did not, at any time, exceed any applicable ambient air standards. That letter also discussed what the Respondent believes to be extenuating circumstances surrounding the alleged PSD violation. The April 9, 1996 letter is included in this Order as Attachment 2.

4. The Respondent met with Ecology on April 9, May 3, and May 8, 1996 to discuss the circumstances surrounding the NOV and what actions may be necessary by the Respondent and Ecology to resolve the NOV. The Respondent does not agree that it violated the PSD regulations. The Respondent does agree that it violated the NSPS limits but contends it was an

1 inadvertent violation. Nonetheless, the Respondent offered to meet a number of conditions which
2 will reduce actual and/or potential air contaminant emissions. Subsequent to those meetings, the
3 Respondent and Ecology further discussed those conditions. The conditions and other
4 agreements reached during those meetings and discussions are contained in this Order.

5
6 5. The Respondent is considering the issuance of an Energy Savings Performance Contract
7 to privatize steam generating services at the Hanford Site to reduce costs associated with such
8 service. The Contract is likely to result in alterations of steam generation systems at the Hanford
9 Site.

10 11 IV. Conclusions of Law

12
13 1. The Respondent is the owner/operator of an air emission source as defined in WAC 173-
14 400-040 and is subject to Chapter 173-400 WAC permitting requirements and emission limits.

15
16 2. The Respondent failed to meet the NSPS sulfur dioxide limits required in WAC 173-400-
17 115 for the 300 Area #1 Package Boiler.

18
19 3. Ecology has also concluded that the Respondent failed to meet the PSD permitting
20 requirements in WAC 173-400-141 for the 300 Area #1 Package Boiler. As noted in Section III,
21 paragraph 4 of this Order, the Respondent does not agree that this violation occurred.

22
23 4. Any person who violates the provisions of Chapter 70.94 RCW or its implementing
24 regulations is subject to enforcement under Chapter 70.94 RCW and WAC 173-400-230. RCW
25 70.94.431(1) states that in addition to or as an alternate to any other penalty provided by law, any
26 person who violates any of the provisions of the chapter may incur a civil penalty in an amount
27 not to exceed ten thousand dollars per day for each violation. Each such violation shall be a
28 separate and distinct offense, and in the case of a continuing violation, each day's continuance
29 shall be a separate and distinct violation.

30 31 V. Order

32
33 Based on the Statement of Facts and Conclusions of Law set forth above as well as Attachments
34 1 and 2 of this Order, Ecology will, in accordance with Section VI, paragraph 4 of this Order,
35 forego issuing a civil penalty to address the violations identified in the NOV, provided the
36 Respondent completes the actions described in paragraphs 1 through 8 below in a manner
37 acceptable to Ecology.

38
39 1. The Respondent shall abide by applicable provisions of Chapter 173-400 WAC and
40 Chapter 70.94 RCW at the Hanford Site.

41
42 2. The Respondent shall secure permits for airborne emissions discharged at the Hanford Site
43 as required by applicable law.

44
45 3. Ecology accepts and the Respondent shall abide by the Assurance of Discontinuance for
46 the 300 Area package boiler provided in their April 9, 1996 letter and WAC 173-400-230(3).
47 Restart of the boiler shall be contingent upon the Respondent meeting new source permitting
48 requirements.
49

4. Ecology accepts and the Respondent shall abide by the written commitment provided in the Respondent's May 7, 1996 letter (Attachment 3 to this Order), to discontinue operation of the following boilers:

- a. Three Wickes boilers located in the 100KE Area,
- b. Three Wickes boilers located in the 100KW Area,
- c. One Foster-Wheeler boiler in the 100N Area
- d. Two Combustion Engineering boilers located in the 100N Area,
- e. One Trane package boiler located at the 200E Powerhouse,
- f. Four Erie City boilers located at the 200W Powerhouse,
- g. One Nationwide package boiler located at the 300 Area Powerhouse, and
- h. Three International boilers located at the 300 Area Powerhouse.

Restart of any of these boilers shall be contingent upon the Respondent meeting new source permitting requirements.

5. The Respondent shall not emit more than 193 tons of sulfur dioxide from the 300 Area steam generating boilers (a 25% reduction from emissions reported for calendar year 1995) during the period July 1, 1997 through June 30, 1998.

6. The Respondent shall not emit more than 129 tons of sulfur dioxide from the 300 Area steam generating boilers (a 50% reduction from emissions reported for calendar year 1995) during the period July 1, 1998 through June 30, 1999. Thereafter, this annual (July 1 - June 30) limit of 129 tons shall remain in effect unless modified by future order.

7. By July 1, 1998, the Respondent shall discontinue the use of fuel oil with a sulfur content exceeding 0.7% by volume for combustion in steam generating boilers at the Hanford Site. The Respondent shall ensure that any steam generating boiler required by law, regulation, or this Order to meet new source permitting requirements and/or Best Available Control Technology use only fuel which meets such requirements.

8. The Respondent shall incorporate conditions 5, 6 and 7 stipulated above into any future Requests For Proposal and contracts for the Energy Savings Performance Contract. In addition, any such proposals or contracts shall require the contractor to meet Best Available Control Technology standards (as defined in Chapter 173-400 WAC) for the type and size of steam generating equipment used in the 300 Area after July 1, 1998.

VI. General Terms and Conditions

1. **Definitions:** Unless otherwise specified, the definitions set forth in Chapter 70.94 RCW and Chapter 173-400 WAC shall control the meanings of the terms used in this Order.

2. **Attachments:** All attachments referenced above are incorporated by reference and are enforceable parts of this Order.

3. **Transference of Property Prior to Satisfaction of the Order:** The Respondent shall provide for continued implementation of paragraphs 3 through 8 in Section V of this Order by incorporating a provision requiring compliance in any transfer or conveyance of any interest in property involving the stationary sources addressed by Section V of this Order. The Respondent

1 shall also provide a copy of this Order to any prospective purchaser, lessee, transferee, assignee,
2 or other successor in such interest. The Respondent shall provide written notice of any such
3 transfer to Ecology at least thirty (30) days prior to completion of the transfer.

4
5 **4. Enforcement:** If Ecology determines that the Respondent has complied completely with
6 the conditions set forth in Section V of this Order and no new information has been revealed
7 which aggravates the seriousness of the violations, Ecology will not assess a civil penalty or take
8 any other enforcement actions against the Respondent to address the violations in the NOV. If,
9 however, Ecology determines that the Respondent failed to comply with the conditions set forth
10 in Section V of this Order without sufficient cause, Ecology reserves its right to take appropriate
11 enforcement action against the Respondent under Chapter 70.94 RCW. Such enforcement
12 actions may include, but not be limited to, civil penalties and administrative orders to address the
13 violations in the NOV, and for non-compliance with this Order. Civil penalties or administrative
14 orders imposed against the Respondent shall be appealable in accordance with Chapter 43.21B
15 RCW.

16
17 **5. Excusable Delays:** Delays in meeting the terms and conditions set forth in Section V. of
18 this Order will be considered excusable if the delay is caused by events or conditions outside the
19 Respondent's control and could not have been avoided by the exercise of due care. In the event
20 the Respondent is unable to comply with any item in Section V. due to an excusable delay, the
21 Respondent shall provide Ecology timely written notice describing the reasons for the delay along
22 with a request for a schedule extension. Ecology shall approve or deny such request in writing
23 within fifteen (15) days of receipt. Neither increased costs of performance of the terms of this
24 Order nor changed economic conditions shall constitute excusable delays.

25
26 **6. Termination:** This Order may be terminated by Ecology at any time if Ecology
27 determines that the requirements set forth in the Order are not sufficient to protect human health
28 and the environment, or if the respondent fails to comply with requirements of this Order. A
29 decision by Ecology to terminate this Order shall not be appealable to the Pollution Control
30 Hearings Board or subject to review in superior court.

31
32 **7. Modifications:** This Order may be modified by mutual agreement of the parties.
33 Modifications shall be in writing and signed by authorized representatives of the Respondent and
34 Ecology. Authorized representatives shall be the Respondent's Director of the Environmental
35 Assurance, Permits, and Policy Division; and the Program Manager, or his/her designee, for
36 Ecology's Nuclear Waste Program.

37
38 **8. Ecology's Reservation of Rights:** Ecology's signature on this Order in no way
39 compromises Ecology's authority to issue additional orders or other actions if Ecology determines
40 that such orders or actions are needed to address compliance with applicable laws and regulations.

41
42 **9. Respondent's Reservation of Rights:** Except as specifically set forth herein, the
43 Respondent reserves and does not waive any rights, authority, claims or defenses that it may have
44 or wish to pursue in any administrative, judicial or other proceeding with respect to any person.

45
46 **10. Anti-Deficiency Act:** The Respondent maintains that any requirement for payment or
47 obligation of funds under this Order is subject to the provisions of the Anti-Deficiency Act, 31
48 U.S.C. § 1341. The Respondent also maintains that any requirement for payment or obligation of
49 funds under this Order is subject to the availability of appropriated funds and that the
50 unavailability of such funds may constitute a valid defense to any administrative or judicial action
51 that is brought to enforce the terms of this Order. Ecology does not agree that failure to obtain
52 adequate funds or appropriations to comply with this Order shall constitute a release from or

1 defense to any administrative or judicial action which may be brought to enforce this Order. The
2 Respondent and Ecology agree that it is premature to raise the validity of such defense at this
3 time. If, at any time, adequate funds or appropriations are not available to comply with this
4 Order, the Respondent shall notify Ecology in writing and Ecology shall determine whether or not
5 it is appropriate to adjust the deadlines set forth in this Order. The Respondent reserves the right
6 to raise the Anti-Deficiency Act as a defense to any action brought to enforce this Order, and
7 Ecology reserves the right to contest any such assertion.

8
9 11. **Satisfaction:** The provisions of this Order shall be deemed satisfied when the Respondent
10 receives written notification from Ecology that the Respondent has completed the actions
11 required by paragraphs 3 through 8 of this Order, as amended by any modifications. Ecology will
12 not unreasonably withhold such notification.

13
14 12. **Waiver of Appeal Rights:** This Order is not subject to appeal pursuant to Chapter
15 43.21B RCW or Chapter 70.94 RCW.

16
17 13. **Effective Date:** This Order is effective after signature by both the Respondent and
18 Ecology on the date it is signed by Ecology.

19
20 VII Signatures

21
22
23 U.S. Department of Energy
24
25
26
27
28
29

30 Dated:
31 James E. Rasmussen, Director
32 Environmental Assurance, Permits, and Policy Division
33 Richland Operations Office
34
35
36

37 Washington State Department of Ecology
38
39
40
41
42
43

44
45 Dated:
46 Mike Wilson, Program Manager
47 Nuclear Waste Program
48



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

March 6, 1996

Mr. James Rasmussen, Director
Office of Environmental Assurance,
Permits and Policy
Richland Operations Office
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

Dear Mr. Rasmussen:

Enclosed with this letter is a Notice of Violation (DE 96NM-033) for failing to meet certain requirements under Washington's Clean Air Act for the 300 area Package Boiler. The Notice of Violation (NOV) requires you to meet with our office within the next 30 days. This meeting will allow us the opportunity to discuss the circumstances surrounding the violations and potential actions for each of our offices to take in resolving this issue. This letter provides you with some of our thoughts in preparation for the meeting.

First of all, I want to make it clear that the decision to initiate an enforcement action was made after numerous discussions with USDOE and contractor staff and a significant amount of time spent looking for solutions to this issue. Ecology staff noted a lack of compliance for the 300 Area Package Boiler to your staff on May 15, 1995. We attempted to resolve this issue informally at the staff level as we believed that to be the most expeditious and efficient path forward. It was only after those efforts were deemed unsuccessful that we formally notified USDOE of the noncompliance through our October 16, 1995 letter.

Throughout this process, our goals are, and will remain, assisting you in achieving compliance and reducing air pollution. The violations noted in the NOV are of concern to me, not only because they include the exceedance of federally established pollution limits, but also because they are indicative of other potential violations noted at the Hanford Site. However, we do not believe that the resources required by either of our offices in processing additional paperwork is the best use of our budgets and staff time. Instead, it is our hope that our goals can be met for air issues across the site through resolution of the NOV at hand.

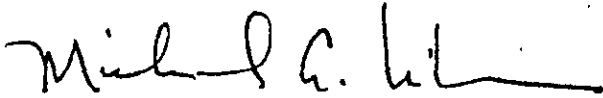
We want to quickly resolve this issue as our time spent on processing this violation has already exceeded our anticipated budget for air issues. Although we look forward to our meeting with

Mr. James Rasmussen, Director
March 6, 1996
Page 2

you, our intent is to not engage in prolonged negotiations. Let us both strive to put this issue behind us and get on with work more directly supportive of our goals.

Please contact me at (360) 407-7150 with any general questions regarding this issue or Mr. Bob King at (360) 407-7147 with technical questions and to set-up our meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Wilson", with a stylized flourish at the end.

Mike Wilson, Manager
Nuclear Waste Program

MW:djb
Enclosure

cc: Ray Nye, EPA/Seattle
Mary Sue Wilson, AAG
Tanya Barnett, AAG
Hector Rodriguez, USDOE
Jeff Luke, WHC
Brian Dixon, ICF Kaiser/Hanford
Al Conklin, WDOH

bcc: Rich Hibbard, Air Program
Judy Geier, Air Program
Oliver Wang, Kennewick
Jeanne Wallace, Kennewick
John Williams, Central Programs
Jerry Gilliland, E & I

DEPARTMENT OF ECOLOGY

IN THE MATTER OF:)	NOTICE OF VIOLATION
)	
U.S. Department of Energy)	DE 96NM-033
Richland, Washington)	
)	
Respondent)	

I. Statutory Authority

1. This Notice of Violation (NOV) is issued to the U.S. Department of Energy (Respondent) for violations at the Hanford Site, pursuant to RCW 70.94.332.

This Notice is issued to the Respondent for failing to meet the State prevention of significant deterioration (PSD) regulations (WAC 173-400-141) and new source performance standards (NSPS) regulations (WAC 173-400-115).

II. Findings

2. Pursuant to Title 1, Part C of the Federal Clean Air Act (Act), 42 U.S.C. Sections 7470-7492, the U.S. Environmental Protection Agency (EPA) promulgated PSD regulations at 40 CFR Subpart 52.21 and NSPS regulations at 40 CFR Part 60.

3. Section 110(a)(2)(C) of the Act, 42 U.S.C. Section 7410(a)(2)(C), requires state implementation plans (SIPs) to contain a program to regulate the construction and modification of new stationary sources to ensure that the National Ambient Air Quality Standards (NAAQS) are attained and maintained within all of a State's air quality control regions.

4. On July 1, 1981, the Washington State Department of Ecology (Ecology) promulgated regulations (WAC 173-400-141 and WAC 173-400-115) incorporating the federal PSD and NSPS regulations.

5. Effective October 1, 1983, and pursuant to 40 CFR Subpart 52.21(u), the EPA granted partial delegation to Ecology to administer the federal PSD program. 48 Fed. Reg. 48285. On May 29, 1992, this partial delegation was superseded by a new partial delegation to administer the federal PSD program, as it existed on July 1, 1989.

6. The Hanford Site is a major stationary source. A "major stationary source" means any stationary source which emits or has the potential to emit one hundred (100) tons per year or more of any air contaminant regulated by the State or Federal Clean Air Acts. WAC 173-400-030(40)(a)(i) and 40 CFR Subpart 52.21(b)(1)(i).

7. A "Major modification" is defined as "any physical change or change in method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the FCAA...." WAC 173-400-030(39).

8. If the net emissions increase resulting from a physical change to or a change in method of operation at a major stationary source exceeds the federal "significant" emissions level for any pollutant set forth in WAC 173-400-030(67), then such a change constitutes a "major modification" and is subject to the PSD permit requirements of WAC 173-400-141.

9. WAC 173-400-110(1)&(2) require that a notice of construction application must be filed by the owner or operator for PSD review and an order of approval issued by Ecology prior to the construction or modification of a major stationary source.

10. WAC 173-400-115 adopts by reference 40 CFR Part 60 (NSPS), as in effect on January 1, 1993. 40 CFR Subpart 60.40c(a) applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 6, 1989 and that has a maximum design heat input capacity of 100 million Btu per hour or less, but greater than or equal to 10 million Btu per hour.

11. 40 CFR Subpart 60.42c(d) sets the SO₂ emission limits for combusting oil at 0.50 lb/million Btu, or as an alternative, the oil used for combustion contains no greater than 0.5 weight percent sulfur.

12. The Respondent owns and operates a number of boilers across the Hanford Site. One such boiler is the 300 Area package boiler for steam generation known as 300 Area #1 boiler with a rated capacity of 60,000 pounds steam per hour which is about 84 million Btu heat input per hour.

13. The construction of the 300 Area package boiler commenced in September 1989. Ecology has determined that construction of the boiler constitutes a major modification of the source subject to the PSD permit requirements set forth in WAC 173-400-141.

14. The Respondent has not submitted a PSD permit application to Ecology for the package boiler as required by WAC 173-400-141, and consequently Ecology has not approved construction or operation of the package boiler pursuant to the requirements of WAC 173-400-141.

15. Furthermore, the boiler has historically burned #6 fuel oil. Ecology estimates that the SO2 emission rate is about 1.2 lb/million Btu and that the maximum sulfur content of the #6 fuel oil is about 1.75 percent. Therefore, use of this fuel exceeds the NSPS's SO2 emission limits identified in Finding #11 above.

16. Therefore, Ecology finds that the Respondent is in violation of WAC 173-400-141 for failure to apply for and obtain the required PSD permit and operating the boiler without the required PSD permit. Ecology also finds that the Respondent is in violation of WAC 173-400-115 for failure to meet NSPS SO2 limits (40 CFR Subpart 60.42c(d)).

17. Any person who violates any provisions of Chapter 70.94 RCW or its implementing regulations is subject to enforcement under Chapter 70.94 RCW and WAC 173-400-230.

18. A penalty under RCW 70.94.431 to further address the violation noted above may be issued by Ecology thirty days following your receipt of this Notice of Violation (RCW 70.94.332). RCW 70.94.431(1) states that in addition to or as an alternate to any other penalty provided by law, any person who violates any of the provisions of chapter may incur a civil penalty in an amount not to exceed ten thousand dollars per day for each violation. Each such violation shall be a separate and distinct offense, and in the case of a continuing violation, each day's continuance shall be a separate and distinct violation.

III. Required Conference

19. Within 30 days of receipt of this NOV, the Respondent is required to appear before Ecology for the purpose of providing information pertaining to the violation. WAC 173-400-230(1). To set-up this conference, the Respondent shall contact Bob King at:

Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
TEL: (360) 407-7147

20. This NOV shall become effective immediately upon issuance.

Dated this 6th day of March 1996.

Mike Wilson
Mike Wilson, Program Manager
Nuclear Waste Program



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

APR 09 1996

96-EAP-037

Mr. Michael A. Wilson
 Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504-7600

Dear Mr. Wilson:

NOTICE OF VIOLATION DE 96NM-033

- References:
- (1) Letter, J. E. Rasmussen, RL, to J. S. Stohr, Ecology, "300 Area Boilers Compliance Response," EAP:HRM, dated November 20, 1995.
 - (2) Letter, Mike Wilson, Ecology, to J. E. Rasmussen, RL, Notice Of Violation DE 96NM-033, dated March 6, 1996.

On March 6, 1996, the State of Washington Department of Ecology (Ecology) issued Notice of Violation (NOV) DE 96NM-033 (Reference Letter 2), to the U.S. Department of Energy, Richland Operations Office (RL), for failing to meet the requirements of Washington Administrative Code (WAC) 173-400-141 and WAC 173-400-115 in regard to construction and operation of the 300 Area package boiler (identified in the Hanford Site Air Operating Permit Application, DOE/RL-95-07 as emission point 300 F-384 005).

Pursuant to RCW 70.94.435, RL is submitting this Assurance of Discontinuance to resolve the subject NOV. The Assurance of Discontinuance is based on the following actions taken by RL on January 7, 1996, to physically shut down the boiler.

On January 7, 1996 the following actions were taken by RL to physically shut down the boiler:

- The feedwater supply valve to the boiler was closed and locked and tagged out.
- The main steam isolation valve was closed and locked and tagged out.
- All water was drained from the boiler.
- The boiler burner gun was removed from the boiler.
- The electrical supply to the boiler was locked open (off).
- RL does not intend to restart this boiler. The fuel supply line was disconnected and separated from the boiler on April 5, 1996. The fuel supply valve to the boiler has been isolated and the piping physically separated and capped off.

APR 09 1996

Mr. Michael A. Wilson
96-EAP-037

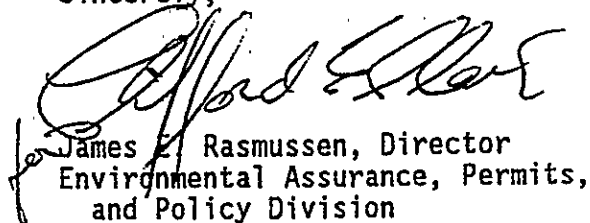
-2-

RL would also like to note, as discussed in Reference Letter 1, that emissions from the 300 Area package boiler did not at any time exceed any applicable ambient standard. The constituents of concern are NO_x and SO₂. The ambient standard for NO_x is 0.05ppm. The ambient standard for SO₂ is 0.02ppm. Ambient concentrations of NO_x from the 300 Area package boiler were less than 0.008ppm. Ambient concentrations of SO₂ from the 300 Area package boiler were less than 0.006ppm. RL would also like to note that emissions from the package boiler for calendar years (CY) 1990 through 1992, were reported to the local Air Pollution Control Authority (APCA) and that CY 1993 through CY 1994 emissions have been reported to Ecology. (At this writing, RL is preparing the CY 1995 emissions report for submittal to Ecology.)

Finally, RL would like to note that in 1989, when RL obtained guidance from the local APCA for installation and operation of the package boiler, the local APCA was the appropriate authority for New Source Review. RL believed that the local APCA was the appropriate authority for air permitting at the Hanford Site until June 15, 1992, when Ecology announced it was exercising its pre-emption authority under RCW 70.105.240 to pre-empt all other state, regional, and local authorities for the Hanford Site. Therefore, in 1989, RL did not verify with Ecology the extent of the authority of the APCA (Reference Letter 1). Since 1992, RL has tried to meet Ecology's expectations.

Should you have any questions, please contact me or Hector Rodriguez of my staff on (509) 376-6421.

Sincerely,


James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

EAP:CEC

cc: B. Dixon, WHC
W. Dixon, ICF KH
R. Jim, YIN
J. Luke, WHC
R. Nye, EPA
D. Powauke, NPT
J. Wilkinson, CTUIR
B. Williamson, WHC

RECEIVED



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 10 1996

King/Witczak

MAY 07 1996

96-EAP-089

Mr. Joseph S. Stohr
Section Manager
Lacey Headquarters Section
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Stohr:

COMPREHENSIVE BOILER LISTING

Enclosed are two lists relevant to boilers on the Hanford Site. The first enclosure lists all boilers on the Hanford Site and the status of each. The second enclosure list those boilers which the U.S. Department of Energy, Richland Operations Office, commits to not operate again.

Should you have any questions or comments, please contact me or Hector Rodriguez, of my staff, on 376-6421.

Sincerely,

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

EAP:HMR

Enclosures:

1. Comprehensive Boiler Listing
2. Boilers Not To Be Operated

cc w/encl:

J. Luke, WHC
H. Debban, ICF KH
B. Dixon, WHC
W. Dixon, WHC

Listing of All Boilers on the Hanford Site

100KE:

✓ 3 Wickes Boilers (not identified in Hanford Site Air Operating Permit [AOP] Application, DOE/RL 95-07) - oil fired - deactivated in 1970.

100KW:

✓ 3 Wickes oil fired boilers deactivated in 1967.

100-N Facility:

✓ 1 Foster-Wheeler boiler deactivated in 1989.

✓ 2 Combustion Engineering boilers deactivated in 1989.

200E (284E Powerhouse):

3 Erie City Boilers (identified in AOP Application as 200 F-284E 001 1, 200 F-284E 001 2, and 200 F-284E 001 3) - coal fired - active.

2 Riley Boilers (identified in AOP Application as 200 F-284E 001 3 and 200 F-284E 001 4) - coal fired - active.

✓ 1 Trane package boiler, Murray Division - (identified in AOP Application as 200E F-284E 005 1) oil fired (#2 diesel) - deactivated in 1989

200W (284W Powerhouse):

✓ 4 Erie City Boilers (identified in AOP Application as 200W F-284W 001 1, 200W F-284W 001 2, 200W F-284W 001 3, and 200W F-284W 001 4) - coal fired - deactivated in 1995.

284WB/200W:

1 Babcock & Wilcox Package Boiler (identified in AOP Application as 200W F-284W 005) - oil fired (#2 diesel 0.05% sulfur) - Active (has approved NOC)

384/300:

2 Riley Boilers (identified in AOP Application as 300 F-384 002 and 300 F-384 006) - oil fired (#6 diesel) - active

✓ 1 Package Boiler (identified in AOP Application as 300 F-384 005) - oil fired (#6 diesel) Deactivated 1-7-96

✓ 3 International boilers (identified in AOP Application as 300 F-384001 001, 300 F-384001 002, and 300 F-384001 003) - coal fired - Deactivated in 1989

1171/1100:

1 Parker Boiler (not identified in AOP Application because it is an "insignificant emission unit") - Natural Gas fired - Active

LIST OF BOILERS RL COMMITS NOT TO BE OPERATED

100KE

3 Wickes oil fired boilers deactivated in 1970.

100KW

3 Wickes oil fired boilers deactivated in 1967.

100-N Facility

1 Foster-Wheeler boiler deactivated in 1989.

2 Combustion Engineering boilers shutdown in 1989.

200 East Powerhouse

1 Trane package boiler located at the 200 East Powerhouse deactivated in 1989.

200 West Powerhouse

4 Erie City boilers at the 200 West Powerhouse deactivated in 1995.

300 Area Powerhouse

1 Nationwide package boiler at the 300 Area Powerhouse deactivated in 1996.

3 International boilers at the 300 Area Powerhouse deactivated in 1994.